

REMARKS

Claims 25-59 and 97-122 are pending in the application and stand rejected. By the above amendment, claims 97-115 and 117-122 have been amended and claim 116 has been canceled without prejudice. Applicants respectfully request reconsideration of the claim rejections.

Claim Rejections - 35 U.S.C. §101

Claims 97-121 stand rejected as being directed to non-statutory subject matter. Claims 97-121 are directed to a computer readable medium having stored thereon a set of instructions that are executable by a computer to implement a conversational virtual machine. Accordingly, withdrawal of the rejection is requested.

Claim Rejections - 35 U.S.C. §103

Claims 25-59 and 97-122 stand rejected as being unpatentable over the U.S. Patent No. 5,748,841 to Morin. It is respectfully submitted that at the very least, Morin is legally deficient to establish a *prima facie* case of obviousness against claims 25 and 97.

On a fundamental level, the inventions of claims 25 and 97 are *starkly different* from Morin. The claimed inventions are directed to systems and methods that are based on a *conversational computing* paradigm that provides conversational computing via a multi-modal conversational user interface by managing dialog and context, etc., across different platforms, applications, devices, etc. having different user interface modalities. This concept is not disclosed or suggested by Morin.

Morin is directed to user interface front-end application that can be "added-on" to an application to implement a Natural Language User (NLU) interface for the application, which enables a user to communicate with an application using natural language words, sentence

fragments, etc. (see Col. 3, lines 5-10). The NLU interface provides a mechanism for a user to interactively learn the application language and give the user guidance in acquiring an understanding of the target application language in context (see, e.g., Col. 4, lines 23-64).

In this regard, with respect to claim 25, for example, Morin clearly does not teach or suggest, e.g., a conversational kernel for generating multi-modal dialogs in response to the input queries and input events, and for managing context associated with different active applications, much less a conversational API (application program interface) for providing an interface between the active applications and the conversational kernel. Moreover, with respect to claim 97, Morin does not teach or suggest, e.g., a kernel adapted to manage dialog and context, conversational engines and resources and communication across different platforms, applications, devices or combinations thereof, each having one or more different user interface modalities, to provide a coordinated, universal conversational user interface (CUI) across the different user interface modalities. Again, the fundamental distinction between Morin and the claimed inventions is readily apparent. At the very least, there is no basis for Examiner's characterization of Morin as teaching a conversational virtual machine.

For at least the above reasons, claims 25 and 97 are clearly distinct and non-obvious over Morin. In addition, all claims that depend from claims 25 and 97 are patentable over Morin at least for the same reasons given for base claims 25 and 97. Accordingly, withdrawal of the claim rejections is requested.

Respectfully submitted,


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